

**ORIGINAL**

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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RICHARD FARMER,

Plaintiff,

-against-

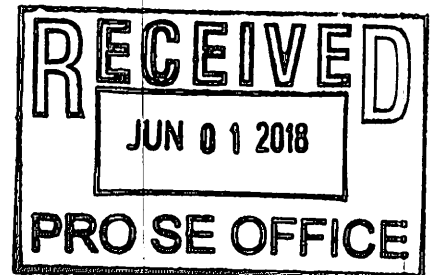
DR. LUCIA PATINO, OPTOMETRIST, P.C.,  
D/B/A PATINO EYE CARE,  
DR. LUCIA PATINO OD, OWNER,  
RODRIGO MOLINA, OWNER, G.M., AND  
DR. ANGELA V. DUSSAN OD, ET AL.,

Defendants.  
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CIVIL ACTION No.: 1:18-CV-01435

**FILED IN CAMERA**

**Letter re: Magistrate Judge  
Hon. Ann M. Donnelly  
and Hon. Lois Bloom**



**PHYSICAL ALTERCATION of PLAINTIFF's PROCESS SERVER**

Richard Farmer, Plaintiff appearing Pro Se informs this Court of two incidences that occurred yesterday on May 31, 2018 between the hours of 3:45 pm and 4:45 pm, after the Plaintiff hired Joslin Wang to serve as a process server, copies of the said Summons and Complaint to the following Defendants while Plaintiff waited outside in a taxi cab for Mrs. Wang to return during the last two summons and complaints that were being served to Defendants;

- 1) First Incident Physical Altercation committed by Defendants Lucia Patino OD: Plaintiff and Mrs. Wang took an Uber ride to Patino Eye Care, 8114 Roosevelt Ave without incident to serve Defendants Rodrigo Molina, Plaintiff received confirmation hours earlier that Dr. Lucia Patino was in fact working at Patino Eye Care the second location, so Plaintiff and Mrs. Wang switched to another car service and flagged down a green taxi cab to perform a three stop one way service, when Plaintiff and Mrs. Wang arrived at Patino Eye Care second location 95-34 Roosevelt Ave, Plaintiff waited for Mrs. Wang longer than usual to return to the awaiting taxi cab, when Mrs. Wang returned to the taxi cab three minutes later she reported that she was in fact attacked and grabbed by the arm by Defendants Lucia Patino after she served Defendants Patino with a copy of the Summons and Complaint in hand (See *Exhibits "B"*), Mrs. Wang described the incident and quote; ( Mrs. Wang) when I turned away to leave the office Patino physically grabbed my arm and would not let me go. I was so scared, she wouldn't let go of my arm. Defendants Patino said and quote; if you leave I will follow you.

Defendants Lucia Patino physically and intentionally grabbed Mrs. Wang by the arm and refused to release her arm, not allowing Plaintiff's Process Server to leave the confines of Patino Eye Care of her own free will.

Defendants Patino intentionally and physically grabbed the Plaintiff's process server Mrs. Joslin Wang and held her against her will while inside the confines of Patino Eye Care, Mrs. Wang was in fact held against her will and Defendants will did not let her arm go, after the Defendants was in fact served with a Federal summons and civil complaint.

- 2) Second Incident Defendants Dr. Angela Dussan intentionally made attempts to evade being served a copy of the summons and complaint: Plaintiff and Mrs. Wang arrived at Brilliant Vision Optical at 4:40 pm , Plaintiff confirmed several hours earlier that Dr. Dussan worked until 5:00 pm, while Plaintiff stayed in the taxi cab, Mrs. Wang went into Brilliant Vision Optical and served Dr. Angela Dussan, when Mrs. Wang returned to the Taxi Cab she returned with the summons and complaint in her hand, and with a digital photograph of Dr. Dussan holding and reading the Summons and Complaint inside the store seconds earlier, Mrs. Wang informed the Plaintiff and quote; When I walked in I asked for Dr. Dussan and a woman came out of the examination room and said; Yes, what can I do for you? Mrs. Wang said; you are being served a summons and complaint to appear in Court. Dr. Dussan took the documents in hand, (See Exhibits "C") read the document and saw her name on the documents said and quote; Dr. Dussan no longer works here, gave the summons and complaint back to Mrs. Wang. Mrs. Wang exited Brilliant Vision Optical and came back to the cab and showed the digital photograph of Dr. Dussan to the Plaintiff who confirmed that it was in fact Dr. Angela Dussan, asked Mrs. Wang to go back inside Brilliant Vision Center and leave the summons and complaint on the showcase counter, when Mrs. Wang went back inside Brilliant Vision Center and left the summons and complaint on the showcase counter which in fact she did, Mrs. Wang stated and quote Dr. Angela Dussan yelling out; It will be thrown in the garbage.

Defendants Angela Dussan intentionally made attempts after reading the summons and complaint tried to deceive Plaintiffs Process Server by intentionally telling Mrs. Wang and quote; Dr. Dussan is no longer employed here.

### **PROOF OF SERVICE SUPPLIED**

Plaintiff supplies this Court with (3) Proof of Service and a description of the two incidences written by Joslin Wang (Process Server) and three digital picture images attached to each Proof of Service of the following Defendants accepting and reading summons and complaint after they were in fact served;

- a) (See *Exhibits* "A") Dr. Lucia Patino Receptionist, 8114 Roosevelt Ave, Jackson Heights, NY.
- b) (See *Exhibits* "B") Dr. Lucia Patino OD, 95-34 Roosevelt Ave, Jackson Heights, NY.
- c) (See *Exhibits* "C") Dr. Angela Dussan OD, 97-21 Queens Blvd, Rego Park, NY.

**PRAYER FOR RELIEF**

- d) Plaintiff makes a request before this Court for a Court Order demanding Defendants Lucia Patino and Defendants Angela Dussan to produce electronic video surveillance, electronic sound and imaging video of both incidences pertaining to Mrs. Joslin Wang's, the Plaintiff's process server entering and existing Patino Eye Care and Brilliant Vision Optical on May 31, 2018, during the hours of 3:45 pm and 5:00 pm, when Mrs. Wang was working as a process server for the Plaintiff.
- e) Plaintiff makes a request for monetary sanctions against Defendants if they delete or do not supply the video surveillance tapes, electronic recordings, sound and images of the May 31, 2018 incidences stated in the Court Order demand request.
- f) Plaintiff states the video surveillance tapes will in fact show the Defendants intentionally engaged in behavior too disrupt the duties of a process server to avoid receiving a Federal Summons and Civil Complaint by physically attacking Plaintiff's Process Server and evading being served.

Plaintiff filed Letter in Camera to prevent Defendants from seeking out or locating Joslin Wang (The Process Server) after Defendants Patino physically grabbed her arm and threatened Mrs. Wang that she would be followed.

Dated: New York, New York  
June 1, 2018

Magistrate Judge  
Hon. Lois Bloom  
United States District Court  
Eastern District of NY  
225 Cadman Plaza East  
Southern District of NY  
Brooklyn, NY 11201

Respectfully submitted,  
RICHARD FARMER, Plaintiff  
Appearing Pro Se

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(347) 933-9685

# EXHIBIT “A”



# EXHIBIT "B"



# EXHIBIT "C"

